

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

NATIONAL RIFLE ASSOCIATION OF AMERICA,

Plaintiff,

DECLARATION

-against-

18-cv-00566
(TJM/CFH)

ANDREW CUOMO, both individually and in his official capacity; MARIA T. VULLO, both individually and in her official capacity; and THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES.

Defendants.

Kevin Bishop, Esq., declares the following to be true and correct under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am employed by the New York State Department of Financial Services (“DFS”) as Acting General Counsel. I respectfully submit this Declaration pursuant to the Court’s Order of August 8, 2019 [Dkt. 121], specifically in regard to the Court’s directive concerning the production of: 1) Documents concerning referrals of NRA-related matters to other government agencies [Dkt. 121 at pg. 27-30], and; 2) Documents and communications related to adverse actions against the NRA [Dkt 121 at pg. 49-50].

2. DFS has undertaken a diligent search for records responsive to the demands at issue, more specifically Plaintiff’s RFP 1-3, 4, 10-11, 18-23, 24, 24(2), 25 and 31.

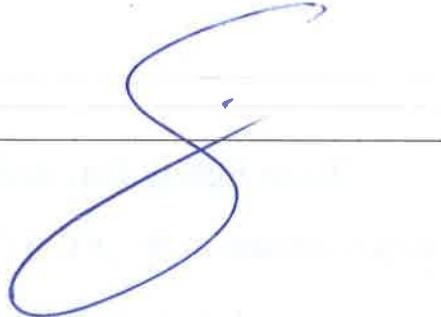
3. Though she is no longer the Superintendent of DFS, and is represented by separate counsel, DFS has also conducted a diligent search of the records in its possession that would be responsive to Plaintiffs RFP 1-3, 5, 10, 17-22, 23, 24 and 25, directed to Maria Vullo.

4. After a diligent search, and as has already been represented to the Plaintiff in DFS' discovery responses, there exist no documents relevant to referrals of matters related to the NRA to other government agencies, beyond what has already been provided to the Plaintiff.

5. After a diligent search, and as has already been represented to the Plaintiff in DFS' discovery responses, there exist no documents relevant to adverse or enforcement actions against financial institutions doing business or potentially doing business with the NRA, other than Lockton, Chubb, and Lloyd's, and beyond what has already been provided to the Plaintiff.

Dated: Albany, New York
August 22, 2019

TO: Sarah Rogers, Esq.
Brewer Attorneys & Counselors
750 Lexington Avenue, 14th Flr.
New York, NY 10022

A handwritten signature in blue ink, appearing to read "Sarah Rogers, Esq.", is written over a horizontal line. The signature is fluid and cursive, with a large, stylized 'S' being a prominent feature.